

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KENNETH JACKSON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 15-cv-11140
)	
EXPERIAN INFORMATION SOLUTIONS,)	Judge Matthew F. Kennelly
INC., OCWEN LOAN SERVICING, LLC,)	
RESIDENTIAL CREDIT SOLUTIONS, INC.,)	
)	
Defendants.)	

**RESIDENTIAL CREDIT SOLUTION, INC.'S MOTION FOR LEAVE TO FILE
SUPPLEMENTAL AUTHORITY IN SUPPORT OF MOTION TO DISMISS
COUNT II OF PLAINTIFF'S COMPLAINT**

Defendant Residential Credit Solutions, Inc. ("RCS"), by and through its attorneys, Quarles & Brady LLP, hereby moves the Court for leave to file the United States District Court for the Northern District of Illinois' recent decision entered on March 22, 2016 in *Keith William Connor v. JP Morgan Chase Bank*, attached hereto as Exhibit A, as additional authority in support of RCS's pending Motion to Dismiss Count II of Plaintiff's Complaint. As grounds for its motion, RCS states that the instant case and *Connor* involve nearly identical facts, the same allegation against the defendant (violation of the Fair Credit Reporting Act (FCRA)), the same argument in support of dismissal of the claim (reporting historical information regarding an account is permissible under the FCRA), and the Court adopted the Federal Trade Commission Guidelines in determining there was no violation of the FCRA, which RCS urges this Court to do in its Motion to Dismiss Count II of Plaintiff's Complaint.

WHEREFORE, Residential Credit Solutions, Inc. respectfully requests that the Court grant its motion for leave to file the proposed supplemental authority.

Dated: March 31, 2016

Respectfully submitted,

RESIDENTIAL CREDIT SOLUTIONS, INC.

By: /s / J. Michael Hearon
One of Its Attorneys

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